

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

RHONDA BURNETT, JEROD BREIT,)
JEREMY KEEL, HOLLEE ELLIS, and)
FRANCES HARVEY, on behalf of)
themselves and all others similarly)
situated,)

Plaintiffs,)

vs.)

THE NATIONAL ASSOCIATION OF)
REALTORS, REALOGY HOLDINGS)
CORP. (n/k/a ANYWHERE REAL)
ESTATE, INC.), HOMESERVICES OF)
AMERICA, INC., BHH AFFILIATES,)
LLC, HSF AFFILIATES, LLC, RE/MAX)
LLC, and KELLER WILLIAMS REALTY,)
INC.,)

Defendants.)

CASE NO. 19-CV-00332-SRB

Judge Stephen R. Bough

**OBJECTORS BENNY D. CHEATHAM, ROBERT DOUGLASS, DOUGLAS FENDER,
AND DENA FENDER’S SUGGESTIONS IN SUPPORT OF THEIR RULE 59(e)
MOTION TO ALTER OR AMEND THE ORDER REQUIRING THEIR ATTENDANCE
IN PERSON AT THE NOVEMBER 26, 2024 FAIRNESS HEARING**

Objectors Benny D. Cheatham, Robert Douglass, Douglas Fender, and Dena Fender (Cheatham objectors) respectfully submit this Memorandum containing suggestions in support of their Rule 59(e) Motion to Alter or Amend the Text Order docket number 1566 in the above case. Objectors, in order to avoid duplicating arguments already ably made, join in Mrs. Monestier’s motion to reconsider (docket number 1574) this text order and incorporate those arguments herein. Objectors also point out the inequitable nature of requiring that they be present in their person, but not requiring Defendant representatives or the Plaintiffs themselves

to appear. Objectors' Counsel will still be present at the hearing in order to present their objection to the Court.

KNIE & SHEALY

/s/ Patrick E. Knie

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November 13, 2024